1	JOSEPH P. RUSSONIELLO (CASBN 44332) United States Attorney				
2	BRIAN J. STRETCH (CASBN 163973) Chief, Criminal Division				
4 5 6 7 8 9	JEFFREY D. NEDROW (CASBN 161299) Assistant United States Attorneys 150 Almaden Boulevard, Suite 900 San Jose, California 95113 Telephone: (408) 535-5045 Fax: (408) 535-5066 Email: jeff.nedrow@usdoj.gov Attorneys for Plaintiff IN THE UNITED ST	ATES DISTRICT COURT			
11	FOR THE NORTHERN DISTRICT OF CALIFORNIA				
12	UNITED STATES OF AMERICA,)	No.: CR 09-00597-JF			
13	Plaintiff,	STIPULATION AND PROPOSED			
14	v.)	ORDER FOR CONTINUANCE OF SENTENCING HEARING			
15	CHRISTINE SHINN,				
16 17	Defendant.				
18	The United States, through its counsel Jeffrey Nedrow, and defendant Christine Shinn,				
19	through her counsel Miles Ehrlich, hereby agree and stipulate to a continuance of the sentencing				
20	hearing in this case scheduled for April 7, 2010 to June 23, 2010 at 9:00 a.m.				
21	The parties agree that the following reasons exist for this continuance:				
22	The government and the defense are continuing to provide information to the Probation				
23	Office in connection with this matter. Both parties believe this information will assist the				
24	Probation Office in connection with the preparation of the Presentence Report. Additional time				
25	is needed for the Probation Officer to receive this information and prepare the Presentence				
26	Report. Accordingly, a continuance is necessary to provide the Court with a full picture of the				
27	offense conduct at sentencing. The Probation Officer has been informed of this requested				
28	//				
	STIPULATION RE: CONTINUANCE	1			

1	continuance.		
2		Respectfully submitted,	
3			
4	March 30, 2010	/s/	
5		/s/ MILES EHRLICH Counsel for Christine Shinn	
6	N. 1.20.2010		
7	March 30, 2010	JEFFREY D. NEDROW	
8		Assistant United States Attorney	
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	STIPULATION RE: CONTINUANO CR 09-00597-JF	CE 2	

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8	DI THE LINUTED OF LITTLE DISTRICT COLUMN				
9	IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA				
10	0	No.: CR 09-00597-J			
11	1	ORDER CONTINU			
12	2 V.	SENTENCING HEA	ARING		
13					
14	Defendant.				
15					
16					
17	Based on the stipulation of the parties and the facts set forth in the stipulation between the				
18	parties, and good cause appearing,				
19	IT IS HEREBY ORDERED that the sentencing hearing in this case is continued from				
20					
22					
23		MA			
24	JEREM	Y FOCEL States District Judge			
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26	6				
27	7				
28	8				
	STIPULATION RE: CONTINUANCE CR 09-00597-JF 3				